

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND**

In re:	*	
YOLANDE E. ESSANGUI	*	Case No. 16-1-2984 -JS
Debtor	*	(Chapter 7)
*   *   *   *   *	*	
YOLANDE E. ESSANGUI	*	Adversary Number 16-201
Plaintiff	*	
v.	*	
SLF V-2015 TRUST	*	
Defendant	*	
*   *   *   *   *	*	

**MOTION FOR EXTENSION OF DISCOVERY DEADLINE**

SLF V-2015 Trust, Defendant, by its attorney, Michael J. Klima, Jr., files its Motion For Extension of Discovery Deadline and states as follows:

1. Pursuant to the Parties' December 20, 2016 Joint Rule 26(f) Statement and the Court's March 7, 2017 Scheduling Order And Rule 26(f) Report Approval, the discovery deadline is March 31, 2017.
2. On February 28, 2017, the Defendant served discovery requests on Plaintiff.
3. Plaintiff's response to those discovery requests was due by March 30, 2017 pursuant to F.R.Civ.P. 33(b)(2), 34(b)(2)(A), and 36(a)(3) and F.R.Bankr.P. 7033, 7034, and 7036.
4. To date, Plaintiff has not responded to Defendant's discovery requests.

5. On March 30, 2017, the Defendant served a subpoena on DeVry Medical International..

6. Defendant seeks an extension of the discovery deadline to allow for the Plaintiff to respond to its discovery requests within the discovery period (but not to extend the time by which Plaintiff's responses are due) and to give DeVry Medical International an opportunity to respond to the subpoena within the discovery period.

7. In the event the discovery deadline is extended, Defendant submits an extension of the dispositive motion deadline would also be warranted

WHEREFORE, SLF V-2015 Trust, Defendant, respectfully requests the Court extend the discovery deadline to April 30, 2017 and extend the dispositive motion deadline to May 31, 2017.

/s/Michael J. Klima, Jr.

Michael J. Klima, Jr. #25562  
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Pasadena, MD 21122  
(410)768-2280  
Attorney File: 16-13093

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 31st day of March 2017, a copy of the foregoing Motion For Extension Of Discovery Deadline was electronically served on:

Ronald J. Drescher, Esq.  
4 Reservoir Circle, Suite 107  
Baltimore, MD 21208

/s/Michael J. Klima, Jr.

Michael J. Klima, Jr.